

# **EXHIBIT 2**

**EXHIBIT TO  
JOINT PRETRIAL ORDER**



precondition – white bloc voting that usually defeats the Hispanic preferred candidate in SBISD school board elections; Plaintiff cannot carry her burden to affirmatively prove that her sole proposed illustrative district will in fact provide Hispanics in SBISD a “real” opportunity to elect the school board members of their choice; and that Plaintiff cannot carry her burden to satisfy the totality of the circumstances test (i.e., the senate factors) that Hispanics in SBISD do not possess the same opportunities to participate in the political process and elect representatives of their choice enjoyed by other voters in SBISD.

Defendants request Judgment for Defendants, and that Plaintiff take nothing by this suit.

**ABERNATHY, ROEDER, BOYD  
& HULLETT, P.C.**

*/s/Charles J. Crawford*

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of Defendants’ Contentions was served upon Plaintiff’s counsel by attachment to the Joint Pretrial Order on October 6, 2023.

*/s/Charles J. Crawford*

Charles J. Crawford